

MICHAEL N. FEDER  
Nevada Bar No. 7332  
DICKINSON WRIGHT PLLC  
8363 West Sunset Road, Suite 200  
Las Vegas, NV 89113  
Telephone: 702-550-4440  
Facsimile: 844-670-6009  
Email: [mfeder@dickinson-wright.com](mailto:mfeder@dickinson-wright.com)

MARTIN D. HOLMES (*Pro Hac Vice admitted*)  
Tennessee Bar No. 012122  
PETER F. KLETT (*Pro Hac Vice admitted*)  
Tennessee Bar No. 012688  
DICKINSON WRIGHT PLLC  
Fifth Third Center, Suite 800  
424 Church Street  
Nashville, TN 37219  
Telephone: 615-244-6538  
Facsimile: 844-670-6009  
Email: [mdholmes@dickinsonwright.com](mailto:mdholmes@dickinsonwright.com)  
[pklett@dickinsonwright.com](mailto:pklett@dickinsonwright.com)

*Attorneys for Plaintiffs, Putative Collective Class Members  
and Putative Hawaii Class Members*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DANIEL GONZALEZ and JEFFREY HUGHES,  
on behalf of themselves and others similarly  
situated,

Plaintiffs,

v.

DIAMOND RESORTS INTERNATIONAL  
MARKETING, INC., DIAMOND RESORTS  
INTERNATIONAL, INC., DIAMOND  
RESORTS CORPORATION, and WEST MAUI  
RESORTS PARTNERS, L.P.,

Defendants.

Case No. 2:18-cv-00979-APG-NJK

STIPULATION AND ORDER  
EXTENDING DEADLINE FOR THE  
PARTIES TO SUBMIT PROPOSED  
COLLECTIVE CLASS NOTICES  
AND CONSENT FORM

1 Plaintiffs and Defendants HEREBY STIPULATE AND AGREE, by and through their  
2 respective counsel, as to the following:

3 1. By Order entered on July 29, 2019, the Court granted Plaintiffs' Motion for  
4 Conditional Certification and ordered the parties to confer and submit proposed notices and  
5 consent form by August 28, 2019. *Doc. 52, p. 11.*


6 2. The parties have conferred and the process is ongoing. The parties, however, need  
7 additional time.

8 3. Subject to the Court's approval, the parties need through September 11, 2019 to  
9 submit agreed upon notices and consent form or to submit briefs on the areas where there is  
10 disagreement as to their contents for the Court's resolution.

11 4. Based on the foregoing, the parties stipulate to an extension from August 28, 2019  
12 to September 11, 2019, to submit agreed upon notices and consent form, and unless an agreement  
13 can be reached as to the entire contents of same, to file briefs on the areas where there is  
14 disagreement for the Court's resolution.

15 IT IS SO STIPULATED this 28<sup>th</sup> day of August, 2019.

16  
17 **IT IS SO ORDERED.**

18  
19  
20   
21 UNITED STATES DISTRICT JUDGE  
22 Dated: August 29, 2019.  
23  
24  
25  
26  
27  
28

1 DICKINSON WRIGHT PLLC

LEWIS ROCA ROTHGERBER CHRISTIE LLP

2 /s/ Martin D. Holmes

/s/ Alison M. Hamer

3 MICHAEL N. FEDER

HOWARD E. COLE

4 Nevada Bar No. 7332

Nevada Bar No. 4950

8363 West Sunset Road, Suite 200

JENNIFER K. HOSTETLER

5 Las Vegas, NV 89113

Nevada Bar No. 11994

6 MARTIN D. HOLMES

3993 Howard Hughes Pkwy, Suite 600

7 *(Admitted Pro Hac Vice)*

Las Vegas, NV 89169-5996

Tennessee Bar No. 012122

KIRSTIN E. MULLER

8 PETER F. KLETT

*(Admitted Pro Hac Vice)*

9 *(Admitted Pro Hac Vice)*

California Bar No. 186373

Tennessee Bar No. 012688

ALISON M. HAMER

10 Fifth Third Center, Suite 800

*(Admitted Pro Hac Vice)*

424 Church Street

California Bar No. 258281

11 Nashville, TN 37219

BENJAMIN J. TREGER

12 *Attorneys for Plaintiffs,*

*(Admitted Pro Hac Vice)*

13 *Putative Collective Class Members*

California Bar No. 285283

14 *and Putative Hawaii Class Members*

Hirschfeld Kramer LLP

233 Wilshire Boulevard, Suite 600

Santa Monica, California 90401

15 *Attorneys for Defendants*

16  
17  
18 IT IS SO ORDERED:

19 \_\_\_\_\_  
NANCY J. KOPPE

20 United States Magistrate Judge

21  
22 DATED: \_\_\_\_\_